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## REMARKS

Claims 1-2, 5-16, 18, 22-29, 36, 39-48, 50-54 and 56-72 are pending in the present application. By this Amendment, the title is amended; the specification is amended; original claims 3-4, 17, 19-21, 30-35, 37-38, 49 and 55 are cancelled; original claims 1, 5-7, 13-14, 22-25, 27, 29, 39, 41, 43-44, 46-47, 50, 52-54 and 56 are amended; and new claims 57-72 are added. Applicant respectfully requests reconsideration of the present claims in view of the following remarks.

### I. Formal Matters:

#### Claim Objections

Applicant has amended claims 1, 5-7, 13-14, 22-25, 27, 29, 41, 44, 47, 50, 52-53 and 56 (original claim 30-32 and 49 have been cancelled) as shown above in order to replace the objected to language, "chosen from," with "selected from the group consisting of" language. Accordingly, Applicant respectfully requests withdrawal of the objection to claims 1, 5-7, 13-14, 22-25, 27, 29-30, 32, 41, 44, 47, 49-50, 52-53 and 56.

### II. Prior Art Rejections:

Claims 1-56 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,637,758 issued to Sajic et al. (hereinafter "Sajic"). This rejection is respectfully traversed.

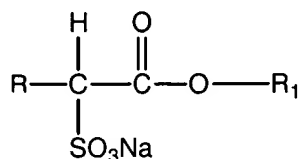
Applicant's claimed invention, embodied in independent claim 1, is drawn to a detergent composition consisting essentially of a primary surfactant system, a secondary surfactant system, water, and one or more optional additives selected from the group consisting of an alkanolamide; an amphoteric surfactant; an antibacterial agent; an antimicrobial agent; an aryl sulfonate; ethanol; an ethoxylated alcohol; magnesium oxide; magnesium chloride; sodium hydroxide; a preservative; a perfume; a thickener; a dye; a C<sub>8</sub>-C<sub>18</sub> sulfosuccinate, a C<sub>8</sub>-C<sub>18</sub> sulfosuccinamate, a C<sub>8</sub>-C<sub>18</sub> surcosinate, and alkali metal, alkaline earth metal, amine and ammonium salts thereof; and a combination thereof; wherein (i) the primary surfactant system consists of at least one primary surfactant selected from the group consisting of a linear alkyl benzene sulfonic acid, a linear alkyl benzene sulfonate, an  $\alpha$ -olefin sulfonate, an alcohol ether

sulfate, an alkyl sulfate, and alkali metal, alkaline earth metal, amine and ammonium salts thereof, (ii) the secondary surfactant system consists of at least one secondary surfactant selected from the group consisting of an alkyl polyglycosides, and (iii) the weight ratio of the at least one primary surfactant to the at least one secondary surfactant, based on the solids content of the detergent composition, is at least 3:1.

Applicant's claimed invention, embodied in independent claim 50, is drawn to a detergent composition consisting essentially of a primary surfactant system, a secondary surfactant system, water, and one or more optional additives selected from the group consisting of an alkanolamide; an amphoteric surfactant; an antibacterial agent; an antimicrobial agent; an aryl sulfonate; ethanol; an ethoxylated alcohol; magnesium oxide; magnesium chloride; sodium hydroxide; a preservative; a perfume; a thickener; a dye; a C<sub>8</sub>-C<sub>18</sub> sulfosuccinate, a C<sub>8</sub>-C<sub>18</sub> sulfosuccinamate, a C<sub>8</sub>-C<sub>18</sub> surcosinate, and alkali metal, alkaline earth metal, amine and ammonium salts thereof; and a combination thereof; wherein (i) the primary surfactant system consists of (a) at least one linear C<sub>10</sub>-C<sub>16</sub> alkyl benzene sulfonic acid or alkali metal, alkaline earth metal, amine and ammonium salt thereof selected from the group consisting of dodecylbenzene sulfonic acid, magnesium dodecylbenzene sulfonate, sodium dodecylbenzene sulfonate, triethanolammonium dodecylbenzene sulfonate, magnesium/sodium dodecylbenzene sulfonate, and magnesium/sodium/triethanol ammonium dodecylbenzene sulfonate, and (b) at least one alcohol ether sulfate having 1 to 4 moles of ethoxylation; (ii) the secondary surfactant system consists of at least one C<sub>8</sub> to C<sub>16</sub> alkyl polyglycoside with a degree of polymerization ranging from 1 to 3, and (iii) the weight ratio of the at least one linear C<sub>10</sub>-C<sub>16</sub> alkyl benzene sulfonic acid or alkali metal, alkaline earth metal, amine and ammonium salt thereof to the at least one C<sub>8</sub> to C<sub>16</sub> alkyl polyglycoside, based on the solids content of the detergent composition, ranges from 3:1 to 5:1.

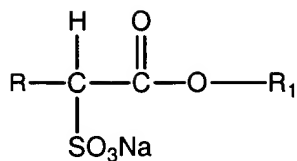
Applicant's claimed invention, embodied in independent claim 52, is drawn to a detergent composition consisting essentially of a primary surfactant system, a secondary surfactant system, water, and one or more optional additives selected from the group consisting of an alkanolamide; an amphoteric surfactant; an antibacterial agent; an antimicrobial agent; an aryl sulfonate; ethanol; an ethoxylated alcohol; magnesium oxide; magnesium chloride; sodium hydroxide; a preservative; a perfume; a thickener; a dye; a C<sub>8</sub>-C<sub>18</sub> sulfosuccinate, a C<sub>8</sub>-C<sub>18</sub>

sulfosuccinamate, a C<sub>8</sub>-C<sub>18</sub> surcosinate, and alkali metal, alkaline earth metal, amine and ammonium salts thereof; and a combination thereof; wherein (i) the primary surfactant system consists of at least one primary surfactant selected from the group consisting of a linear alkyl benzene sulfonic acid, a linear alkyl benzene sulfonate, an α-olefin sulfonate, an alcohol ether sulfate, an alkyl sulfate, and alkali metal, alkaline earth metal, amine and ammonium salts thereof, (ii) the secondary surfactant system consists of at least one alkyl polyglycoside, at least one α-sulfomethyl ester having the following chemical structure:



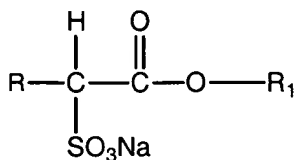
wherein R is an alkyl group having 10 to 16 carbon atoms, and R<sub>1</sub> is a sodium atom, and mixtures thereof, and (iii) the weight ratio of the at least one primary surfactant system to the secondary surfactant system, based on the solids content of the detergent composition, is at least 2.7:1.

Applicant's claimed invention, embodied in independent claim 56, is drawn to a method for cleaning soiled dishware, pots and/or pans, wherein the method comprises contacting soiled dishware, pots and/or pans with a detergent composition consisting essentially of a primary surfactant system, a secondary surfactant system, water, and one or more optional additives selected from the group consisting of an alkanolamide; an amphoteric surfactant; an antibacterial agent; an antimicrobial agent; an aryl sulfonate; ethanol; an ethoxylated alcohol; magnesium oxide; magnesium chloride; sodium hydroxide; a preservative; a perfume; a thickener; a dye; a C<sub>8</sub>-C<sub>18</sub> sulfosuccinate, a C<sub>8</sub>-C<sub>18</sub> sulfosuccinamate, a C<sub>8</sub>-C<sub>18</sub> surcosinate, and alkali metal, alkaline earth metal, amine and ammonium salts thereof; and a combination thereof; and removing the soil from said dishware, wherein (i) the primary surfactant system consists of at least one primary surfactant selected from the group consisting of a linear alkyl benzene sulfonic acid, a linear alkyl benzene sulfonate, an α-olefin sulfonate, an alcohol ether sulfate, an alkyl sulfate, and alkali metal, alkaline earth metal, amine and ammonium salts thereof, (ii) the secondary surfactant system consists of at least one secondary surfactant selected from the group consisting of an alkyl polyglycoside and an α-sulfomethyl ester having the following chemical structure:



wherein R is an alkyl group having 10 to 16 carbon atoms, and R<sub>1</sub> is a sodium atom, and (iii) the weight ratio of the at least one primary surfactant to the at least one secondary surfactant, based on the solids content of the detergent composition, is at least 3:1.

In each of Applicant's independent claims, the claimed invention is directed to compositions or methods of using compositions, wherein the compositions contain specifically claimed secondary surfactant systems selected from the group consisting of (i) an alkyl polyglycoside alone or in combination with (ii) an  $\alpha$ -sulfomethyl ester having the following chemical structure:



wherein R is an alkyl group having 10 to 16 carbon atoms, and R<sub>1</sub> is a sodium atom. The recited compositions specifically exclude any mixtures of mono-salt  $\alpha$ -sulfomethyl esters and di-salt  $\alpha$ -sulfomethyl esters as required in the teaching of Sajic.

The teaching of Sajic is directed to detergent compositions comprising (i) a critical amount of divalent salts, (ii) an  $\alpha$ -sulfonated methyl ester or a blend of mono-salt and di-salt  $\alpha$ -sulfonated methyl esters of a fatty acid (referred to in the teaching of Sajic as a "hydrotrope surfactant") having a ratio of mono salt to di-salt of at least 2:1, (iii) one or more anionic surfactants, and (iv) foam stabilizing surfactants. As disclosed in the teaching of Sajic, the compositions must contain either (i) an  $\alpha$ -sulfonated methyl ester or (ii) a blend of mono-salt and di-salt  $\alpha$ -sulfonated methyl esters of a fatty acid (referred to in the teaching of Sajic as a "hydrotrope surfactant") having a ratio of mono salt to di-salt of at least 2:1.

Given that Applicant's claimed compositions and methods of using the compositions specifically exclude (i) an  $\alpha$ -sulfonated methyl ester and (ii) a blend of mono-salt and di-salt  $\alpha$ -sulfonated methyl esters of a fatty acid as required in the teaching of Sajic, the teaching of Sajic fails to teach or suggest Applicant's claimed composition as featured in Applicant's independent claims 1, 50, 52 and 56. The disclosure of Sajic actually teaches away

from Applicant's claimed invention embodied in independent claims 1, 50, 52 and 56 given the required components in the compositions of Sajic.

For at least the reasons given above, the teaching of Sajic cannot make obvious Applicant's claimed invention embodied in Applicant's independent claims 1, 50, 52 and 56. Since claims 2, 5-16, 18, 22-29, 36, 39-48 and 50-54 (as well as, new claims 57-72) depend from independent claims 1, 50 and 52 (and 56), and recite additional claim features, the teaching of Sajic cannot make obvious claims 2, 5-16, 18, 22-29, 36, 39-48 and 50-54 (and new claims 57-72). Accordingly, withdrawal of this rejection is respectfully requested.

### III. Conclusion:

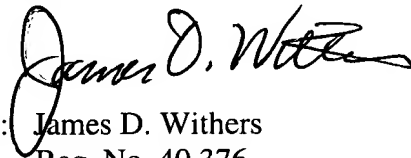
For at least the reasons given above, Applicant submits that claims 1-2, 5-16, 18, 22-29, 36, 39-48, 50-54 and 56-72 define patentable subject matter. Accordingly, Applicant respectfully requests allowance of these claims.

No additional fees are believed due; however, the Commissioner is hereby authorized to charge any deficiency, or credit any overpayment, to Deposit Account No. 13-2725.

Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, the Examiner is respectfully requested to contact Applicant's representative at the telephone number listed below.

Respectfully submitted,

MERCHANT & GOULD, LLC



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